

Juror ID: _____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	
UNITED STATES OF AMERICA	:	
	:	
-v-	:	20 Cr. 330 (AJN)
	:	
GHISLAINE MAXWELL,	:	<u>JURY QUESTIONNAIRE</u>
	:	
Defendant.	:	
	:	
-----X		

PRELIMINARY INSTRUCTIONS

Please read the following instructions carefully before completing any portion of this questionnaire. Please print your juror number in the space provided at the top of **each** page. **Do not write your name on the questionnaire.** Please answer each and every question fully. Some questions have more than one part.

YOU ARE SWORN TO GIVE TRUE AND COMPLETE ANSWERS TO ALL QUESTIONS IN THIS QUESTIONNAIRE. This questionnaire is designed to help simplify and shorten the jury selection process. The purpose of the questionnaire is to determine whether prospective jurors can decide this case impartially based upon the evidence presented at trial and the legal instructions given by the presiding judge. The questions are not intended to inquire unnecessarily into personal matters. Although some of the questions may appear to be of a personal nature, please understand that the Court and the parties must learn enough information about each juror's background and experiences to select a fair and impartial jury.

Please answer all questions to the best of your ability. If you do not know the answer to a question then write, "I don't know." There are no "right" or "wrong" answers, only truthful answers. If you have strong feelings about this case in general, please do not hesitate to share them. Although you may be a perfectly good juror in another case, this may or may not be the right case for you to sit on as an impartial juror. Both parties have the right to get honest answers and to hear your true opinions. Do not discuss the case or your answers with anyone. It is important that the answers be yours alone. Remember, you are sworn to give true and complete answers to all questions.

If you need extra space to answer any question, please use the extra blank sheets of paper included at the end of the questionnaire. Be sure to indicate on the blank page the number of the question you are answering. Do not write anything on the back of any page.

DO NOT DISCUSS YOUR QUESTIONS AND ANSWERS OR THE CASE WITH ANYONE, NOW OR UNTIL FURTHER INSTRUCTED BY THE COURT. You should not discuss the questions or answers with fellow jurors. It is very important that your answers be your own individual answers. More broadly, do not discuss the case with anyone, including the lawyers

Commented [A1]: DEFENDANT OBJECTION: As discussed below, the defendant believes that background information on each juror should be included on this questionnaire, as the Government has proposed to do in the written questionnaire in each of the most recent high-profile trials.

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(except in the presence of the Court), your fellow jurors, your family, your friends, or anyone else. Do not communicate about the case in any way, including telephone, e-mail, any social media app or website (such as Facebook), any communications app or website (such as Twitter). You must also avoid reading or hearing about the case (or anyone participating in the case) in newspapers, in magazines, on the radio or television, or on the Internet.

DO NOT DO YOUR OWN RESEARCH ON THE CASE. Do not conduct any research into the case (or anyone participating in the case) at any time before your entire jury service has been completed. That includes performing Internet searches, asking other people about the case, reading news stories, books, or reports about the case, or watching films or television programs that relate to the case. Do not read, watch, or listen to any information about this case.

If you believe that any of your answers contain private information that could embarrass you or otherwise seriously compromise your privacy and wish to request that the Court keep them confidential and not distribute them beyond the judge and counsel, you may indicate that on one of the blank pages at the end of this form. (Please identify the specific answer or answers that you believe should remain confidential.) After a jury has been selected, all copies of your responses to the questionnaire will be returned to the Court.

SUMMARY OF THE CASE

The Court is selecting a jury for a trial commencing on Monday, November 29, 2021. Although it is never possible to predict the length of a trial, currently this trial is expected to last approximately [] weeks.

Commented [A2]: The parties will submit a joint letter to the Court on October 12, 2021 providing an estimate of the trial length.

This is a criminal case. The defendant, Ghislaine Maxwell, has been charged in an indictment with various criminal offenses. The indictment is not evidence. It simply contains the charges—referred to as “counts”—that the Government intends to prove to the jury at trial beyond a reasonable doubt.

The charges in the Indictment stem from allegations that from at least 1994 through 2004, the defendant conspired with and aided and abetted Jeffrey Epstein to entice minors to travel to engage in criminal sexual activity, to transport minors to engage in criminal sexual activity and to engage in sex trafficking of a minor.

The Indictment charges the defendant in 6 counts: Count One of the Indictment charges the defendant with conspiring with Jeffrey Epstein and others to entice minors to travel to engage in sexual activity for which a person can be charged with a criminal offense. Count Two charges the defendant with enticing a minor to travel to engage in sexual activity for which a person can be charged with a criminal offense, and aiding and abetting the same. Count Three charges the defendant with conspiring with Epstein and others to transport minors to engage in sexual activity for which a person can be charged with a criminal offense. Count Four charges the defendant with transporting a minor to engage in sexual activity for which a person can be charged with a criminal offense, and aiding and abetting the same. Count Five charges the defendant with participating in a sex trafficking conspiracy. Count Six charges the defendant with sex trafficking of a minor, and aiding and abetting the same.

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Ms. Maxwell has pled not guilty to all charges. Ms. Maxwell is presumed innocent, and before she can be found guilty on any charge, the jury must find that the Government has proven each element of that crime beyond a reasonable doubt.

(Please turn the page and read and complete the questionnaire.)

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PLEASE ANSWER THE FOLLOWING QUESTIONS:

BACKGROUND

Name: _____

Title ☐ Dr. ☐ Mr. ☐ Mrs. ☐ Ms. ☐ Miss

Age: _____

Sex/Gender Identity: _____

Your place of birth: _____

Residence:

County _____ City/Town _____ Neighborhood _____

How long have you lived in that area? _____

What is your marital status? ☐ Single ☐ Married ☐ Separated ☐ Divorced ☐ Widowed☐ Live with domestic partner/significant otherAny prior marriages? ☐ Yes ☐ No

If Yes, how many? _____

What is your current job status? (please check)

☐ Employed full-time ☐ Employed part-time ☐ Self-employed ☐ Homemaker☐ Unemployed/laid-off ☐ Disabled ☐ Retired☐ Full-time student (please state area of study) _____☐ Other (please describe) _____What is your occupation? (If you are not currently employed, please describe your most recent prior employment.)

By whom are (were) you employed? _____

How long have you worked (did you work) there? _____

Commented [A3]: GOVERNMENT OBJECTION: The defendant has proposed the language in green color font in this questionnaire. The Government objects to the questions seeking personal information in this "Background" section. The Government does not believe these questions should be included in the written questionnaire, because these questions will not reveal any bias or otherwise provide a basis for a for-cause challenge, which the Government understands to be the purpose of the questionnaire, as a way to expedite jury selection. Rather, the Government submits that any background questions should be asked during the oral voir dire, along with biographical questions. Moreover, the Government objects to the level of detail in these background questions as unduly invasive of jurors and inconsistent with the Court's August 27, 2021 Order for a "streamlined questionnaire." (Dkt. 330). To the extent the Court includes background biographical questions in the written questionnaire, the Government proposes that they be limited in nature and number to avoid identifying potential jurors.

Commented [A4R3]: DEFENDANT: The defense proposes that these questions should be more appropriately asked in the questionnaire rather than voir dire. The Government objects but it was the Government, in the most recent high-profile federal cases, who included the very same background information questions in the written questionnaire. See *United States v. Elizabeth Holmes (Theranos)*, 18 Cr. 258 (EDJ) (N.D. Cal.); *United States v. Robert Kelly*, 19 Cr. 286 (AMD) (EDNY); *United States v. Keith Rainier (Nxvim)*, 18 Cr. 204 (NGG) (EDNY).

In addition to saving immense time, it provides a good-faith foundation for conducting research on the jurors to confirm truthfulness and/or uncover bias. In addition, the verdict in one of longest financial fraud trials in SDNY was overturned due to jury deceit. See *United States v. Daugerdas*, 867 F.Supp.2d 445 (SDNY 2012).

Commented [A5R3]: GOVERNMENT RESPONSE: As noted above, the Government does not believe these questions should be included in the written questionnaire because these questions will not provide a basis for a for-cause challenge. The Government further submits that potential jurors should not write down their names on the written questionnaire. The defendant cites no case for the proposition that the defense has a right to an extended period of time to research potential jurors. That is not the law. "[T]he purpose of the *voir dire* is to ascertain disqualifications, not to afford individual analysis in depth to permit a party to choose a jury that fits into some mold that he believes appropriate for his case." *United States v. Barnes*, 604 F.2d 121, 138 (2d Cir. 1979) (citations omitted). "[S]o long as the court conducts a careful *voir dire* designed to uncover any bias as to the issues or the defendants," the defendants' rights are not infringed. *United States v. Audicino*, 44 F.3d 1102, 1116 (2d Cir. 1995).

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Do (did) you supervise other people? ☐ Yes ☐ No

Please briefly describe what your management and/or supervisory responsibilities have entailed:

If you have held any other occupations in the past five years, please identify them here:

What is the highest level of education you have completed?

☐ Less than high school ☐ High school graduate ☐ Some college/vocational training

☐ College graduate. If so, please indicate degree and/or field of study:

☐ Post-graduate degree. If so, please indicate degree and/or field of study:

Please list all educational institutions you have attended, beginning with high school:

Please complete the following questions regarding your **present spouse or domestic partner/significant other**. If you are divorced, widowed, or separated, please answer the following questions regarding your **former** spouse, partner or significant other's employment:

What is his or her current employment status?

☐ Employed full-time ☐ Employed part-time ☐ Self-employed ☐ Homemaker

☐ Unemployed/laid-off ☐ Disabled ☐ Retired

☐ Full-time student (please state area of study)_____

☐ Other (please describe)_____

What is his or her occupation (or what was it, if he or she is no longer employed)?

By whom is (was) he or she employed?_____

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How long has (did) he or she work there? _____

What are (were) his or her specific duties at the job? _____

Does he or she supervise other people? ☐ Yes ☐ NoDo you have any children, including step-children? ☐ Yes ☐ No

If YES, please list the following for each: (Please include children you are currently raising or have ever raised even if they are not your biological children.)

Gender	Age	Child Living with You	Highest Level of Education	Occupation/School Level (Do NOT list names of employers or schools)
		<input type="checkbox"/> Yes <input type="checkbox"/> No		
		<input type="checkbox"/> Yes <input type="checkbox"/> No		
		<input type="checkbox"/> Yes <input type="checkbox"/> No		
		<input type="checkbox"/> Yes <input type="checkbox"/> No		
		<input type="checkbox"/> Yes <input type="checkbox"/> No		
		<input type="checkbox"/> Yes <input type="checkbox"/> No		

What are your hobbies, major interests, recreational pastimes and spare time activities and sports? _____

What are your spouse/domestic partner/significant other's hobbies, major interests, recreational pastimes and spare time activities and sports? _____

Please list any groups and/or organizations to which you belong (for example, religious groups, professional organizations, volunteer activities, victim's rights groups, etc.): _____

If you have ever been a published or unpublished author, please describe the things you have written and when you wrote them: _____

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When in a group trying to make a decision, do you usually:☐ Strongly express your views to get the outcome you believe is best☐ Participate in the discussion and try to help build a consensus☐ Listen and follow what you think the majority favors☐ Other (please describe) _____Do you have any strong views regarding people who are wealthy? ☐ Yes ☐ No

If Yes, please explain:

Do you have any strong views regarding people who have luxurious lifestyles? ☐ Yes ☐ No

If Yes, please explain:

Commented [A6]: GOVERNMENT OBJECTION: The Government objects to this question on the grounds that it is vague, and will not provide a basis for a for-cause challenge.**Commented [A7]:** GOVERNMENT OBJECTION: The Government objects to these questions as vague and duplicative, and not framed in a way that would provide a basis for a for-cause challenge.

Potential jurors will be called back for further questioning and jury selection from Tuesday, November 16, 2021 through Friday, November 19, 2021. The trial will commence on Monday, November 29, 2021. Generally, trial will be held five days per week, Monday through Friday, from 9:30 a.m. until 5:00 p.m. The Court will not sit on federal holidays, including on Christmas Day (Friday, December 24, 2021). The trial is expected to last about [] weeks.

Commented [A8]: The parties will submit a joint letter to the Court on October 12, 2021 providing an estimate of the trial length.

If you are selected as a juror, you will be required to be present for the taking of testimony and evidence for as long as the trial lasts. There are no plans to sequester the jury, which means you will go home every day after court.

All jury service involves some degree of hardship. Our court and justice system depends on citizens doing their civic duty to serve as jurors which involves temporarily putting aside their regular business for jury service. The Court views service on a jury to be one of the highest duties a citizen owes to the United States. Mere inconvenience or the usual financial hardship of jury service will not be sufficient to excuse a prospective juror. You must show extraordinary personal or financial hardship to be excused from service.

1.	Do any circumstances exist such that serving on the jury in this case would entail <u>serious</u> hardship or <u>extreme</u> inconvenience?
	<input type="checkbox"/> Yes <input type="checkbox"/> No

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	<p>If yes, please briefly describe the undue hardship or extreme inconvenience:</p> <p>_____</p> <p>_____</p> <p>_____</p>
	<p>Please note: In the event you are excused from service on this jury, you will not be excused from jury service in general. You will instead be required to report to the Court's Jury Clerk for placement on another panel for another case.</p>
2.	<p>Do you have any personal commitments that would make it difficult for you to get to court by 9:30 a.m., every day of trial, or remain at the courthouse until [5:30 p.m.]?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, please explain why you would be unable to get to court by 9:30 a.m. or remain until [5:30 p.m.]:</p> <p>_____</p> <p>_____</p> <p>_____</p>
3.	<p>Do you have any difficulty reading, speaking, or understanding English?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
4.	<p>Do you have any medical, physical, or mental condition or illness that makes you unable to serve on a jury, including difficulty hearing, seeing, reading, or concentrating?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, please briefly describe the condition or illness. If you believe you could serve as a juror if such condition were accommodated in some way, please state the accommodation.</p> <p>_____</p> <p>_____</p> <p>_____</p>
5.	<p>Are you taking any medication which would prevent you from giving full attention to all the evidence at this trial?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p>

Juror ID: _____

6.	Do you have any pre-paid travel plans between November 29, 2021 and January 15, 2022? <input type="checkbox"/> Yes <input type="checkbox"/> No
	If yes, please describe your plans and the dates of travel (without indicating the name of where you work or the names of any family members or friends, or other personal information that might identify who you are): <hr/> <hr/> <hr/>
	Do you have any holiday plans for the period December 24 th through January 3 rd ? <input type="checkbox"/> Yes <input type="checkbox"/> No
7.	Do you have any appointments during the next [] weeks that cannot be changed? <input type="checkbox"/> Yes <input type="checkbox"/> No
	If yes, please explain: <hr/> <hr/> <hr/>
	Have you received a vaccine for COVID-19? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, when did you receive the vaccine? _____ In light of the COVID-19 pandemic, do you have concerns about your ability to concentrate at trial, consider all the evidence, and make a conscientious decision in deliberation? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, would courtroom precautions (ex. the use of air filters, use of a larger courtroom) alleviate your concerns? Is there any reason relating to the COVID-19 pandemic that would make jury service an undue hardship for you or anyone in your household? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please explain. _____ Is there anything else going on in your life or work that would prevent you from giving this case your full attention for the duration of trial? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please explain. _____

Commented [A9]: GOVERNMENT OBJECTION: The Government objects to this question on the grounds that the question is duplicative of questions 6 and 7.

Commented [A10R9]: DEFENDANT RESPONSE: There are a number of "plans" for the holidays that do not involve either travel or appointments, about which certain jurors may have strong opinions about missing.

Commented [A11]: The parties will submit a joint letter to the Court on October 12, 2021 providing an estimate of the trial length.

Commented [A12]: The defendant proposes the questions relating to COVID-19. The Government takes no position.

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8.	Do you or does any member of your family or a close friend <u>personally</u> know or have past or present dealings with any of the following individuals?													
	a. The defendant in this case, Ghislaine Maxwell, or her family members <input type="checkbox"/> Yes <input type="checkbox"/> No													
	b. Jeffrey Epstein <input type="checkbox"/> Yes <input type="checkbox"/> No													
	c. The U.S. Attorney for the Southern District of New York, Damian Williams, or anyone else who works for or used to work for the U.S. Attorney's Office for the Southern District of New York? <input type="checkbox"/> Yes <input type="checkbox"/> No													
	d. Any of the Assistant United States Attorneys who are prosecuting this case: <table> <tr> <td>Maurene Comey</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Alison Moe</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Lara Pomerantz</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Andrew Rohrbach</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> </table>		Maurene Comey	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Alison Moe	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Lara Pomerantz	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Andrew Rohrbach	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Maurene Comey	<input type="checkbox"/> Yes	<input type="checkbox"/> No												
Alison Moe	<input type="checkbox"/> Yes	<input type="checkbox"/> No												
Lara Pomerantz	<input type="checkbox"/> Yes	<input type="checkbox"/> No												
Andrew Rohrbach	<input type="checkbox"/> Yes	<input type="checkbox"/> No												
	e. Any of the defense attorneys or law firms who are representing the defendant: <table> <tr> <td>Christian Everdell of Cohen & Gresser LLP</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Jeffrey Pagliuca of Haddon, Morgan and Foreman, P.C.</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Laura Menninger of Haddon, Morgan and Foreman, P.C.</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Bobbi Sternheim of Law Offices of Bobbi C. Sternheim</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> </table>		Christian Everdell of Cohen & Gresser LLP	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Jeffrey Pagliuca of Haddon, Morgan and Foreman, P.C.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Laura Menninger of Haddon, Morgan and Foreman, P.C.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Bobbi Sternheim of Law Offices of Bobbi C. Sternheim	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Christian Everdell of Cohen & Gresser LLP	<input type="checkbox"/> Yes	<input type="checkbox"/> No												
Jeffrey Pagliuca of Haddon, Morgan and Foreman, P.C.	<input type="checkbox"/> Yes	<input type="checkbox"/> No												
Laura Menninger of Haddon, Morgan and Foreman, P.C.	<input type="checkbox"/> Yes	<input type="checkbox"/> No												
Bobbi Sternheim of Law Offices of Bobbi C. Sternheim	<input type="checkbox"/> Yes	<input type="checkbox"/> No												
	f. The United States District Court Judge who is presiding over this case, Alison J. Nathan, or anyone who works on her staff? <input type="checkbox"/> Yes <input type="checkbox"/> No													
	If you answered "yes" to any of the above sub-questions (8.a, 8.b, 8.c, 8.d, 8.e, or 8.f), please explain whom you know, how you know the individual(s), and whether your relationship with that person might make it difficult for you to be a fair and impartial juror in this case: <div style="border-bottom: 1px solid black; height: 15px; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; height: 15px; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; height: 15px; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; height: 15px;"></div>													

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	<hr/> <hr/> <hr/> <hr/>															
	CHARGES AND INDIVIDUALS INVOLVED															
	<p>The indictment alleges that Ghislaine Maxwell conspired with Jeffrey Epstein and did entice minor females to travel to engage in illegal sex acts, transported a minor female to engage in criminal sexual activity, and engaged in sex trafficking of a minor.</p> <p>The indictment is not evidence; it is a formal way of charging a person with a crime in order to bring her to trial. Ms. Maxwell has pleaded not guilty. She is presumed innocent. Unless the government proves that she is guilty of these charges beyond a reasonable doubt, the jury must return a verdict of not guilty.</p>															
	<p>Would the fact that Ms. Maxwell faces a number of charges lead you to believe that she must be guilty of something?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>															
	<p>If yes, please explain:</p> <hr/> <hr/>															
	<p>Please indicate if you ever had any connection with any of the following?</p> <table border="0"> <tr> <td>Palm Beach County (Florida) Police Department</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>Federal Bureau of Investigations</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>U.S. Attorney's Office -Southern District of Florida</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>U.S. Attorney's Office- Southern District of New York</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> <tr> <td>U.S. Department of Justice</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> </table>	Palm Beach County (Florida) Police Department	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Federal Bureau of Investigations	<input type="checkbox"/> Yes	<input type="checkbox"/> No	U.S. Attorney's Office -Southern District of Florida	<input type="checkbox"/> Yes	<input type="checkbox"/> No	U.S. Attorney's Office- Southern District of New York	<input type="checkbox"/> Yes	<input type="checkbox"/> No	U.S. Department of Justice	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Palm Beach County (Florida) Police Department	<input type="checkbox"/> Yes	<input type="checkbox"/> No														
Federal Bureau of Investigations	<input type="checkbox"/> Yes	<input type="checkbox"/> No														
U.S. Attorney's Office -Southern District of Florida	<input type="checkbox"/> Yes	<input type="checkbox"/> No														
U.S. Attorney's Office- Southern District of New York	<input type="checkbox"/> Yes	<input type="checkbox"/> No														
U.S. Department of Justice	<input type="checkbox"/> Yes	<input type="checkbox"/> No														
	<p>If you indicated Yes, please explain your connection:</p> <hr/> <hr/> <hr/> <hr/>															
	EXPERIENCE WITH LEGAL SYSTEM															
	<p>Have you ever served as a juror at trial or in a grand jury? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, how many times? _____</p>															

Commented [A13]: GOVERNMENT OBJECTION: The Government objects to the "Charges & Individuals Involved" section proposed by the defendant on the grounds that it is duplicative of the questions proposed by the Government. In particular, the first question is duplicative of questions above and is argumentative and inappropriate.

Commented [A14R13]: DEFENDANT RESPONSE: The Government has not identified which questions they believe are duplicative. The first question, pertaining to the number of charges, does not appear to be duplicated in any Government-proposed question.

The Second Circuit has specifically approved discussion of the presumption of innocence in jury selection. See *United States v. Velez-Vasquez*, 116 F.3d 58, 61 (2d Cir. 1997) (upholding conviction where judge forgot to instruct on presumption of innocence in closing instructions where the concept had been discussed during voir dire).

Commented [A15]: GOVERNMENT OBJECTION: The Government objects to any references to the Southern District of Florida at this trial. The U.S. Attorney's Office for the Southern District of Florida is not prosecuting this case. As the Government will address in a motion in limine, references to the USAO-SDFL are not appropriate at this trial.

Commented [A16]: GOVERNMENT OBJECTION: The Government does not believe the questions in the "Experience with Legal System" section should be included in the written questionnaire, because these questions will not reveal any bias or otherwise provide a basis for a for-cause challenge. Rather, the Government submits that such questions should be asked during the oral voir dire.

Commented [A17R16]: DEFENDANT RESPONSE: The defense believes that asking these questions on the questionnaire will save substantial amount of time and will allow the Court (and potentially parties) to follow up at the time of voir dire. Access to the information ahead of the voir dire will allow the Court to prepare to ask individual questions as necessary, some of which may best be asked outside the presence of other jurors (for example a prospective juror who previously had a negative experience as a juror).

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Did you serve as a juror in state or federal court? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Were you ever the foreperson of the jury? <input type="checkbox"/> Yes <input type="checkbox"/> No		
If applicable, please briefly describe the case(s) in which you served as a juror using the following table:		
Criminal or Civil	Type of case (e.g., fraud, personal injury, etc.)	Did the jury reach a verdict?
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
What stands out most to you about your experience as a juror? Please explain _____		
Is there anything about that experience that would affect your ability to be a fair and impartial juror in this case? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Have you, a family member, or someone close to you ever been involved in a civil or criminal proceeding as a plaintiff (the party suing), defendant (the party being sued), or potential witness? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____		
Have you ever been interviewed as a potential witness in any kind of legal proceeding? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____		
Have you ever testified as a witness at any kind of legal proceeding, including a trial? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____		
Have you ever testified as an expert witness? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain and provide area of expertise: _____ _____		

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Have you ever filed a criminal complaint?				
<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____				
Have you ever contacted any prosecutor office: State District Attorney, United States Attorney's Office, State Attorney General?				
<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain the reason? _____ _____ _____				
Have you ever reported someone for wrongdoing to your employer or a government agency?				
<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____				
Other than for a minor traffic citation, have you ever been arrested for, charged with, or convicted of a crime?				
<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____ _____ _____				
MEDIA ISSUES				
How much do you rely on the following sources for your news?				
	A lot	Somewhat	Not much	Not at all
Newspapers:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social Media:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Television:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Radio:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Internet:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conversations:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How often do you use or access those sources: <input type="checkbox"/> Daily <input type="checkbox"/> Occasionally <input type="checkbox"/> Rarely				

Commented [A18]: GOVERNMENT OBJECTION: The Government objects to the "Media Issues" section proposed by the defendant on the grounds that it is not streamlined in accordance with the Court's Order. The Government submits that its proposed questions ask the jurors what is necessary on the subject but is not as unduly burdensome as the defendant's proposal. Many of the questions are vague, confusing, and argumentative.

Commented [A19R18]: DEFENDANT RESPONSE: A critical purpose of individual voir dire in a high-profile case such as this is to ascertain what content the jurors have read and what they think they know about the case. The First Circuit's well-reasoned opinion in *Tsarnaev*, currently pending before the U.S. Supreme Court explains why. It is insufficient simply to ask the jurors if they think they can be fair even after seeing media about the case. *See, e.g., United States v. Tsarnaev*, 968 F.3d 24, (1st Cir. 2020) (failure to ask each juror to identify what content they had already read about the case and to identify what they already thought they knew about the case grounds for reversal of death sentence), *cert. granted*, 141 S.Ct. 1683 (Mar. 22, 2021), *oral argument scheduled* (Oct. 13, 2021); *Patriarca v. United States*, 402 F.2d 314, 318 (1st Cir. 1968) (judge must elicit "the kind and degree" of each prospective juror's exposure to the case or the parties" if asked by counsel); *Smith v. Phillips*, 455 U.S. 209, 221-22 (1982) (O'Connor, concurring) (prospective juror "may have an interest in concealing [their] own bias" or "may be unaware of it").

Further, as in *Tsarnaev* decision, much of the information shared on the media about Ms. Maxwell and Mr. Epstein is either inaccurate or inadmissible, or pertains to persons and charges not before this jury. 968 F.3d at 58 ("while the media (social, cable, internet, etc.) gave largely factual accounts, some of the coverage included inaccurate or inadmissible information — like the details of his un-Miranda-ized hospital interview and the opinions of public officials that he should die") (citation omitted). It also included a number of individuals' personal opinions regarding Ms. Maxwell's guilt.

Juror ID: _____

	<p>Please identify by name (all that apply)</p> <p>Newspapers _____</p> <p>Online News Sources _____</p> <p>Magazines _____</p> <p>Radio stations _____</p> <p>Television/Cable stations _____</p> <p>Streaming sources (Netflix, Peacock, Amazon, etc.) _____</p> <p>Podcast providers _____</p> <p>Internet Sites _____</p> <p>Social media platform (Facebook, Instagram, Twitter, etc.) _____</p>
	<p>Do you belong to any groups on social media (ex. Facebook or WhatsApp groups)?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please list the groups: _____</p> <p>_____</p>
	<p>Have you ever posted messages, comments, or opinions on websites/social media, or blogged?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If Yes, please describe the websites or social media platforms that you have used; the types of things you have posted or blogged; and how often you have done it: _____</p> <p>_____</p>
	<p>Do you regularly watch any television shows, movies, dramas, documentaries, or docuseries (on any video platform) involving criminal investigations, crime solving, or criminal trials?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please identify the shows: _____</p> <p>_____</p>
	<p>Please indicate your agreement or disagreement with the following: The media can be trusted to report both sides of controversial issues.</p> <p><input type="checkbox"/> Strongly agree <input type="checkbox"/> Agree <input type="checkbox"/> Disagree <input type="checkbox"/> Strongly disagree</p>
	<p>Please identify by name any criminal cases have you followed in the media?</p>

Juror ID: _____

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	<p>This case has been widely reported in the national and local media. There is nothing wrong with having heard something about this case. It is important to truthfully and fully answer all of the following questions.</p>
	<p>Before coming here today have you read, seen, or heard anything about:</p> <p>Ghislaine Maxwell <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Jeffrey Epstein <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>This Case <input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>How closely have followed any reports about this case, Ghislaine Maxwell or Jeffrey Epstein?</p> <p><input type="checkbox"/> Very closely <input type="checkbox"/> Somewhat closely <input type="checkbox"/> Not closely <input type="checkbox"/> Not at all</p>
	<p>Please indicate the sources from which you have read, seen, heard, or received information about the case, Ghislaine Maxwell or Jeffrey Epstein? (check all that apply)</p> <p><input type="checkbox"/> Newspapers <input type="checkbox"/> Books <input type="checkbox"/> Magazines <input type="checkbox"/> Television <input type="checkbox"/> Radio</p> <p><input type="checkbox"/> Streaming Sites (Netflix, Peacock, Amazon, etc.) <input type="checkbox"/> Podcasts <input type="checkbox"/> Internet</p> <p><input type="checkbox"/> Social Media <input type="checkbox"/> Chat Rooms <input type="checkbox"/> Court Proceedings <input type="checkbox"/> Talked with people</p> <p><input type="checkbox"/> Overheard people talking <input type="checkbox"/> Other Sources (please list) _____</p>
	<p>Please identify by name anything you read, viewed, or listened to regarding this case, Ms. Maxwell or Mr. Epstein:</p> <p>News articles _____</p> <p>Books _____</p> <p>Television Show _____</p> <p>Documentaries _____</p> <p>Docu-Series _____</p> <p>Podcast _____</p>

Juror ID: _____

	<p>Summarize what you know or have heard about this case, Ghislaine Maxwell or Jeffrey Epstein:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
	<p>Please respond to the following based upon anything :</p> <p>Have you read, seen or heard anything you have read, seen, heard and discussed with family, friends, colleagues and co-workers, have you formed any impression or opinion about this case?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please state your impressions or opinions:</p> <p>_____</p> <p>_____</p>
	<p>Have you personally formed an opinion about Ms. Maxwell's guilt or innocence as a result of anything you have heard, read or seen? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please state summarize your opinion: _____</p> <p>_____</p> <p>_____</p>
	<p>Have you discussed this case with family, friends, colleagues, or co-workers</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, summarized what was discussed: _____</p> <p>_____</p>
	<p>Have you verbally stated or posted your opinion on social media about Ms. Maxwell or Mr. Epstein?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, when and where did you state or post your opinion? _____</p>
9.	<p>Before today, had you read, seen, or heard anything about criminal charges brought against Ms. <u>Maxwell</u>?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, please state what you remember hearing, and how or from whom you may have heard (e.g., a friend, the newspaper, a website):</p>

Commented [A20]: The Government proposes the language in purple color font.

Commented [A21R20]: DEFENDANT RESPONSE: The defense objects and incorporates by reference her response to the Government's objection to her "media" section questions above.

Juror ID: _____

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10.	<p>Aside from anything you may have read, seen, or heard about criminal charges brought against Ms. Maxwell, before today, had you read, seen, or heard anything about Ms. Maxwell?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, please state what you remember hearing, and how or from whom you may have heard about Ms. Maxwell (<i>e.g.</i>, a friend, the newspaper, a website):</p> <hr/> <hr/> <hr/>
11.	<p>Based on anything that you have read, seen, or heard about Ms. Maxwell, including anything about criminal charges against Ms. Maxwell, have you formed any opinions about Ms. Maxwell that might make it difficult for you to be a fair and impartial juror in this case?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p style="text-align: center;"><input type="checkbox"/> Not applicable, I have not read/seen/heard about Ms. Maxwell</p>
	<p>If yes, please explain why it might be difficult for you to be a fair and impartial juror in this case:</p> <hr/> <hr/> <hr/> <hr/> <hr/>
12.	<p>Before today, had you read, seen, or heard anything about Jeffrey Epstein?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, please state what you remember hearing, and how or from whom you may have heard (<i>e.g.</i>, a friend, the newspaper, a website):</p> <hr/> <hr/> <hr/>

Juror ID: _____

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13.	<p>Based on anything that you have read, seen, or heard about Jeffrey Epstein, have you formed any opinions about Mr. Epstein that might make it difficult for you to be a fair and impartial juror in this case?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable, I have not read/seen/heard about Mr. Epstein</p>
	<p>If yes, please explain why it might be difficult for you to be a fair and impartial juror in this case:</p> <hr/> <hr/> <hr/> <hr/>
14.	<p>Based on anything you have read, seen, or heard about Ms. Maxwell, including anything about criminal charges brought against Ms. Maxwell, would you be able to follow the Court's instruction to put that information out of your mind and decide this case based only on the evidence presented at trial?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable, I have not read/seen/heard about Ms. Maxwell</p>
	<p>If no, please explain:</p> <hr/> <hr/> <hr/> <hr/>
	<p>When you first learned about this case, what were your reactions?</p> <hr/>
	<p>Have your reactions changed since then? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>
	<p>Have you formed any opinion about:</p>

Commented [A22]: GOVERNMENT OBJECTION: The Government objects to the next series of questions proposed by the defendant that are in green color font. The Government objects on the grounds that these questions would not provide a basis for a for-cause challenge and ask jurors to express opinions based on media coverage. If jurors have had reactions to media coverage, questions about their ability to be fair and impartial will address any questions about their ability to serve as jurors. The proposed questions inappropriately ask jurors to deliberate based on media reporting.

Commented [A23R22]: DEFENDANT RESPONSE: The defense incorporates by reference her response to the Government's objection to her "media" related questions and the case law cited therein.

Juror ID: _____

	<p>This Case <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Ghislaine Maxwell <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Jeffrey Epstein <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please summarize your opinion: _____</p>
	<p>Have you ever expressed an opinion about this case, Ghislaine Maxwell or Jeffrey Epstein?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please summarize what you said: _____</p>
	<p>Based on what you have heard, seen, read, or discussed about this case, have you formed an opinion about the guilt or innocence of Ghislaine Maxwell?</p> <p><input type="checkbox"/> Definitely Guilty <input type="checkbox"/> Probably Guilty <input type="checkbox"/> Probably Not Guilty</p> <p><input type="checkbox"/> Definitely Not Guilty <input type="checkbox"/> Unsure/No Opinion <input type="checkbox"/> Not enough information to decide</p> <p>Please explain why you feel that way: _____</p> <p>_____</p>
	<p>Have you been contacted in connection with a survey about this case?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____</p>
	<p>Have you been involved in a focus group about this case?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____</p>
	<p>Have you discussed this case with anyone working for the media? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain what you discussed: _____</p> <p>_____</p>
	<p>How much news have you read or watched about the current case?</p> <p><input type="checkbox"/> A lot <input type="checkbox"/> A little <input type="checkbox"/> None</p> <p>When was the last time you read, saw, or heard anything related to this case? _____</p>

Juror ID: _____

	<p>How accurate do you feel the reports about this case, in any medium, have been?</p> <p><input type="checkbox"/> Very accurate <input type="checkbox"/> Somewhat accurate <input type="checkbox"/> Not very accurate <input type="checkbox"/> Not accurate</p> <p><input type="checkbox"/> Don't know/No Opinion</p>
	<p>Do you think Ghislaine Maxwell's association with Jeffrey Epstein will make it difficult for you fairly and impartially consider the evidence presented at trial and render a verdict based solely on the evidence?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure</p> <p>If Yes or Unsure, please explain: _____</p>
	<p>If you are selected as a juror in this case, would you be able to refrain from reading about, listening to, or watching any print, electronic media, or Internet coverage in this case?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure</p> <p>If Yes or Unsure, please explain: _____</p>
15.	<p>During the trial, you will hear evidence alleging sex crimes against underage girls. Some of the evidence in this case will involve sexually suggestive or sexually explicit conduct. Is there anything about the nature of this case and the accusations as summarized at the beginning of this questionnaire that might make it difficult for you to be a fair and impartial juror in this case?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
16.	<p>Do you have any specific views or feelings concerning laws regarding the age at which individuals can or cannot consent to sexual activity with other individuals?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, what are your views or opinions, and would they affect your ability to serve as a fair and impartial juror?</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Commented [A24]: The Government proposes the language in purple color font.

Juror ID: _____

17.	Do any of you have any opinion about the enforcement of the federal sex trafficking laws or the federal laws concerning sex crimes against minors that might prevent you from being fair and impartial in this case? <input type="checkbox"/> Yes <input type="checkbox"/> No
	If yes, please explain: _____ _____ _____ _____
18.	Have you or a family member ever lobbied, petitioned, or worked in any other manner for or against any laws or regulations relating to sex trafficking or sex crimes against minors? <input type="checkbox"/> Yes <input type="checkbox"/> No
	If yes, please explain when and what you or your family member did: _____ _____ _____ _____
	Whether reported or not, have you, any family member or anyone close to you, including a child/minor, ever been the victim of any form of sexual abuse? (This includes actual or attempted sexual assault or other unwanted sexual advance, including by a stranger, acquaintance, supervisor, teacher, or family member.) <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please explain: _____ _____
	Whether reported or not, have you, or anyone close to you, including a child/minor, ever felt in danger of being sexually assaulted by another person, including a stranger, acquaintance, supervisor, teacher, or family member? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please explain: _____ _____
	Have you or anyone close to you ever participated in a class or discussion group, read books or articles listened to podcasts, or participated in blogs or chat rooms concerning sexual assault or sexual abuse? <input type="checkbox"/> Yes <input type="checkbox"/> No

Commented [A25]: GOVERNMENT OBJECTION: The Government objects to the next series of questions proposed by the defendant that are in green color font. The Government objects on the grounds that these questions are inappropriate, argumentative, confusing, and excessively detailed. The defendant's proposed questions are not streamlined in accordance with the Court's Order. The Government submits that its proposed questions ask the jurors what is necessary on the subject but is not as unduly burdensome as the defendant's proposal.

Commented [A26R25]: DEFENDANT RESPONSE: Juror's personal experiences (directly or indirectly through family members and close friends) with sexual misconduct has significant potential to bias their opinions towards Ms. Maxwell based on the allegations and evidence in this case. The privacy of a questionnaire affords an opportunity to share these biases confidentially and candidly and best allow the parties to identify who cannot be a fair juror in this case or allows the Court to decide whether individual questioning of that juror is appropriate, based on the sensitive nature of the content of the questions.

Juror ID: _____

	If Yes, please explain: _____
	Have you ever made a claim of inappropriate sexual behavior of any kind (sexual harassment, sexual contact, sexual abuse, or sexual assault/rape)? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____
	Have you ever been accused of any inappropriate sexual behavior of any kind (sexual harassment, sexual contact, sexual abuse, or sexual assault/rape)? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____
	Has your spouse, significant other, any family member, friend, or co-worker ever made a claim of sexual harassment, sexual contact, sexual abuse, or sexual assault/rape? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____
	Has your spouse, significant other, any family member, friend, or co-worker ever been accused of sexual harassment, sexual contact, sexual abuse, or sexual assault/rape? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please explain: _____
	Have you, any family members or close friends, ever suffered from post-traumatic stress disorder as a result of inappropriate sexual behavior? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure If Yes or Unsure, please explain the cause and, without using any names, identify who was involved: _____
	Do you belong to any organizations or groups that have as one of the primary purposes, advocating or promoting federal, state, or local legislation regarding sex abuse? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please identify the organization or group _____
	Are you active in the organization or group or its activities? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, describe the extent of involvement and how often _____ _____
	Have you, any family member or close friend, ever worked or volunteered at any sex abuse crisis center, sex abuse crisis hot line, sex abuse counseling center, or any related entity? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please identify: _____
	Are you familiar with political movements in response to sexual abuse, including but not

Juror ID: _____

	<p>limited to #MeToo, #TimesUp?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>
	<p>Have you, your spouse, significant other, any family, friend, co-worker been involved in or in any way supportive (financially, philosophically or politically) of organizations such as #MeToo, #TimesUp?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p> <p>_____</p>
	<p>Have you ever attended a rally, fundraising event or other events concerning the treatment of women who have been sexually assaulted?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>
	<p>Have you ever contributed money or volunteered time to groups or organizations concerned with women's issue, such as #MeToo, #TimesUp?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>
	<p>Have you or anyone you know had any contact with, worked for, volunteered with, used the services of, or contributed to any entity providing support to individuals claiming to have been sexually abused?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p> <p>_____</p>
	<p>This case involves allegations of sexual assault and sex trafficking of minors.</p> <p>Would you feel uncomfortable if you are selected to sit on this case? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If No, is there any experience that you or anyone close to you has had that may affect your ability to listen to the evidence and reach a fair verdict based only on the evidence or lack of evidence? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>
	<p>Is there any experience that you or anyone close to you has had that may affect how you might view a case such as this <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>

Juror ID: _____

	<p>Do you believe that anyone who discloses having been sexually abused must be telling the truth? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure</p> <p>If Yes or Unsure, please explain: _____</p>
	<p>Would you tend to believe the testimony of woman claiming sexual abuse more, less, or the same as any other witness?</p> <p><input type="checkbox"/> Believe more <input type="checkbox"/> Believe less <input type="checkbox"/> Believe the same <input type="checkbox"/> Unsure</p>
	<p>Would you tend to believe the testimony of a defendant accused of sexual abuse more, less, or the same as any other witness?</p> <p><input type="checkbox"/> Believe more <input type="checkbox"/> Believe less <input type="checkbox"/> Believe the same <input type="checkbox"/> Unsure</p>
19.	<p>Have you ever been involved—as defendant, victim, or any other way—in a case involving sex trafficking or sex crimes against minors?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, without listing names, please explain the nature of the allegations, the approximate date(s), and the outcome, and indicate whether that would affect your ability to serve as a fair and impartial juror in this case:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
20.	<p>Has a relative, close friend, or associate ever been involved—as defendant, victim, or any other way—in a case involving sex trafficking or sex crimes against minors?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, without listing names, please explain the nature of the allegations, the approximate date(s), and the outcome, and indicate whether that would affect your ability to serve as a fair and impartial juror in this case:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
21.	<p>Have you ever been the victim of sexual abuse of any nature?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, please explain, and indicate whether that would affect your ability to serve as a fair and impartial juror in this case:</p>

Commented [A27]: The Government proposes the language in purple color font.

Juror ID: _____

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	MENTAL HEALTH, LAW, LAW ENFORCEMENT
	<p>Have you, your spouse or significant other, family or close friends ever studied or received any mental health training? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>
	<p>Have you ever had any employment or volunteer experience in any of the following areas? (Check each on that applies)</p> <p><input type="checkbox"/> Psychiatry <input type="checkbox"/> Psychology <input type="checkbox"/> Social Work <input type="checkbox"/> Mental Health <input type="checkbox"/> Therapy/Counseling <input type="checkbox"/> Sex Abuse Counseling</p>
	<p>Do you have any family or friends who are psychiatrists, psychologists, mental health therapists/counselors or sex abuse counselors? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, do you often discuss their work with them? _____</p>
	<p>Have you received any training in law, law enforcement or criminology? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>
	<p>Have you ever had any employment or done any volunteer work in any of the following areas? (Check each one that applies to you)</p> <p><input type="checkbox"/> Law Enforcement <input type="checkbox"/> Investigations <input type="checkbox"/> Corrections/Jail/Prison <input type="checkbox"/> Legal Profession <input type="checkbox"/> Prosecution <input type="checkbox"/> Criminal Defense <input type="checkbox"/> Justice System/Courts <input type="checkbox"/> Local/State/Federal Government</p>
	<p>Do you have any family or friends who are in the legal or law enforcement profession?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, do you often discuss their work with them? _____</p>
	<p>Would you believe the testimony of a law enforcement officer simply because he/she is a law enforcement officer? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please explain: _____</p>
	<p>Would you favor the side that had law enforcement officers as witnesses? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>

Commented [A28]: GOVERNMENT OBJECTION: The defendant has proposed additional questions in this section in addition to the questions proposed below on consent. The additional questions proposed by the defendant are duplicative, unnecessarily burdensome, and overly detailed. In addition, questions about experience with mental health issues are not designed to screen for bias and are not appropriate for inclusion in a written questionnaire.

Commented [A29R28]: DEFENDANT RESPONSE: The defense-proposed questions are designed to identify individuals whose training, education and employment may cause the juror to follow their own independent knowledge and not follow the evidence actually presented at trial, or may reveal biases in favor of the Government.

Juror ID: _____

	If yes, please explain: _____
22.	Do you or any member of your family or a close friend work in law, law enforcement, the justice system, or the courts? <input type="checkbox"/> Yes <input type="checkbox"/> No
	If yes, please explain, and indicate whether that would affect your ability to serve as a fair and impartial juror in this case: _____ _____ _____ _____
23.	Do you know or have any association—professional, business, or social, direct or indirect—with any member of the staff of the United States Attorney’s Office for the Southern District of New York? <input type="checkbox"/> Yes <input type="checkbox"/> No
	If yes, please explain, and indicate whether that would affect your ability to serve as a fair and impartial juror in this case: _____ _____ _____ _____
24.	Do you know or have any association—professional, business, or social, direct or indirect—with the Federal Bureau of Investigation, commonly known as the FBI? <input type="checkbox"/> Yes <input type="checkbox"/> No
	If yes, please explain, and indicate whether that would affect your ability to serve as a fair and impartial juror in this case: _____ _____ _____ _____
25.	Do you know or have any association—professional, business, or social, direct or indirect—with the New York City Police Department, commonly known as the NYPD? <input type="checkbox"/> Yes <input type="checkbox"/> No
	If yes, please explain, and indicate whether that would affect your ability to serve as a fair and impartial juror in this case: _____ _____ _____ _____

Juror ID: _____

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26.	<p>Have you, either through any experience you have had or anything you have seen or read, developed any bias or prejudice or other feelings for or against the United States Department of Justice, the United States Attorney's Office for the Southern District of New York, the FBI, or the NYPD?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
	<p>If yes, please explain:</p> <hr/> <hr/> <hr/> <hr/>
27.	<p>Do you have any opinion of the U.S. Attorney's Office for the Southern District of New York or the U.S. Attorney Damian Williams that might make it difficult for you to be a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
	<p>If yes, please explain:</p> <hr/> <hr/> <hr/> <hr/>
28.	<p>Do you have any opinions about prosecutors or criminal defense attorneys generally that might make it difficult for you to be a fair and impartial juror in this case?</p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>
	<p>If yes, please explain:</p> <hr/> <hr/> <hr/> <hr/>

Juror ID: _____

29.	<p>Do you have any opinion about the criminal justice system generally or the federal criminal justice system in particular that might make it difficult for you to be a fair and impartial juror in this case?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>If yes, please explain:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
	CLOSING QUESTIONS
	<p>Do you think Ghislaine Maxwell's association with Jeffrey Epstein will make it difficult for you fairly and impartially consider the evidence presented at trial and render a verdict based solely on the evidence? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure</p> <p>If Yes or Unsure, please explain: _____</p>
	<p>Do you think what you have heard, seen, and read about Ghislaine Maxwell make it difficult for you fairly and impartially consider the evidence presented at trial and render a verdict based solely on the evidence? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure</p> <p>If Yes or Unsure, please explain: _____</p>
	<p>If you were a party to this case - either the prosecution or Ms. Maxwell - is there any reason you would not want yourself to be a juror? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure</p> <p>If Yes or Unsure, please explain: _____</p>
	<p>Some people who are called for possible jury service want to be chosen while others do not. How do you personally feel? (Please check one.)</p> <p style="text-align: center;"><input type="checkbox"/> Very strongly want to serve <input type="checkbox"/> Somewhat want to serve <input type="checkbox"/> Indifferent</p> <p style="text-align: center;"><input type="checkbox"/> Opposed to serving <input type="checkbox"/> Strongly opposed to serving <input type="checkbox"/> Would be difficult to serve</p> <p>Please explain your feelings: _____</p>
	<p>If you were convinced, at the conclusion of the trial, that Ms. Maxwell is either guilty or not guilty of the crimes charged, and a majority of the jurors disagreed with you, would you change your verdict simply because you were in the minority? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure</p> <p>If Yes or Unsure, please explain: _____</p> <p>Is there anything that has come up in this questionnaire that creates doubt in your mind about whether you could be a fair, objective, and impartial juror in this particular case?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

Commented [A30]: GOVERNMENT OBJECTION: The Government objects to the questions proposed by the defendant in the "Closing Questions" section. The Government does not believe these questions should be included in the written questionnaire because these questions will not provide a basis for a for-cause challenge. Some of the questions proposed by the defendant are duplicative of prior questions. Many of the questions are inappropriate, argumentative, confusing, and excessively detailed.

Commented [A31R30]: DEFENDANT RESPONSE: The questions are designed to identify persons for whom a for-cause challenge may be sustained by this Court. The Government has not identified any particular question that is "inappropriate, argumentative, confusing, and excessively detailed," nor have they proposed limiting language that would cure any such problem.

Juror ID: _____

	If yes, please explain: _____
	Is there anything else the Court or the parties should know about you as a prospective juror in this case? _____
	Please state any reason why you believe you could not or should not serve as a juror in this case: _____
	Is there anything not covered in this questionnaire that you feel the Court of the attorneys should know, so that your ability to be a fair and impartial juror can be evaluated? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please explain: _____
	Do you believe you should not serve as a juror in this case? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure If Yes or Unsure, please explain: _____
	Do you believe you should serve as a juror in this case? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure If Yes or Unsure, please explain: _____
	Is there anything else that you think the Court or parties should know that might influence your ability to fairly and impartially judge the evidence in this case and to apply the law as instructed by the Court? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure If Yes or Unsure, please explain: _____
	Is there anything that would cause you to not to want to sit on a jury in a case involving allegation of sexual assault and sex trafficking of minors? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure
	Is there anything about this case, Ms. Maxwell or Epstein that would cause you not to want to be a juror in this case? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure If Yes or Unsure, please explain: _____
	Is there anything about this case, Ms. Maxwell or Epstein that would cause you to want to be a juror in this case? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure If Yes or Unsure, please explain: _____
	Given the high-profile nature of this case and the sensitive nature of the charges, is there any reason why you would feel pressure (personally, professionally, politically, philosophically, or religiously) to return a verdict other than one based only on the evidence? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure If Yes or Unsure, please explain: _____

Juror ID: _____

	<p>Is there anything about the subject matter of this case, or the points covered in this questionnaire, which creates a question in your mind as to whether you could be a fair, objective, and impartial juror in this particular case? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>
	<p>When the time comes for individual oral questioning of prospective jurors, you will have the opportunity to discuss privately with the Court and the attorneys in the case any answers which would require you to reveal information you feel is personal and private and which you do not want to reveal publicly in open court. Would any of the questions above require you to reveal confidential and personal information which you would like to keep private?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please list which question number(s): _____</p>
	<p>Is there any matter you wish to discuss privately with the Judge? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>
	<p>Is there anything else the attorneys or the Court might want to know about you when considering you as a juror in this case? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>
	<p>As a juror it is important that you do not obtain information about this case outside of the courtroom. The Court will instruct you that you are not to watch television, go on the internet, read newspapers, magazines, or any other form of print media, listen to or watch any media coverage, use social media, and/or speak to anyone regarding this case and that the only evidence you are permitted to consider is that which is presented in court. Will you be tempted to disregard this instruction? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>
	<p>If the court instructs you not to discuss the case with anyone until it is finally submitted to you for deliberation at the end of the trial, and then to only discuss it with your fellow jurors in the jury room, would you have difficulty in following that instruction? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please explain: _____</p>

Juror ID: _____

DECLARATION

I, _____ (*juror number*) declare under penalty of perjury that the foregoing answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others, or received assistance in completing the questionnaire.

Signed this _____ day of November, 2021

This image shows a full page of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page, providing a template for writing. There are no margins, text, or other markings on the page.

[illegible]

This image shows a full page of blank handwriting practice paper. It features multiple sets of horizontal lines. Each set consists of three lines: two outer lines and one middle line, creating uniform rows for letter height and placement. The lines are evenly spaced across the entire page, providing a guide for consistent letter formation. There are no margins, text, or other markings on the paper.

Juror ID: _____